## REMARKS

Reconsideration and allowance of the above-identified application are respectfully requested. New claims 48-50 are added. Claims 2, 12, 22, 24-30 and 32 are canceled. Claims 1, 3-11, 13-21, 23, 31, and 33-50 are pending in the application.

Applicant notes that the rejection of claims 45-47 under 35 USC §112, first para. has been withdrawn.

Applicant objects to paragraph 2 of the Office Action that states "the claims fail to further clarify a distinction between the Applicants invention and the cited references," because the statement fails to provide a statutory basis for rejecting the claims, as required, and because the statement disregards well-settled law that the burden is on the Examiner to establish unpatentability, and *not* on the Applicant to establish patentability. Applicant respectfully suggests the Examiner refrains from using such misleading statements, as such statements fail to assist in establishing any prima facie case of unpatentability.

I. The Rejection of Independent Claims 1, 11, 21, and 31

Claims 1, 11, 21, and 31 were rejected under 35 USC §103 in view of U.S. Patent Publication No. 2003/0016684 by Prasad et al in view of U.S. Patent No. 5,912,628 to Jeong and U.S. Patent No. 6,940,866 to Miller. This rejection is respectfully traversed, as the rejection fails to articulate any reasoning or *rational* basis for the obviousness rejection, as required by the Federal Circuit and the Supreme Court.[1] To the contrary, the rejection relies on unfounded and inconsistent statements that demonstrate a tortured interpretation of the references,[2] and an

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[1]"[R]ejections on obviousness grounds cannot be sustained by mere conclusory statements; instead, there must be some articulated reasoning with some rational underpinning to support the legal conclusion of obviousness." *KSR Int'l v. Teleflex, Inc.* No. 04-1350, Slip. op. at 14, 82 USPQ2d 1385, 1396 (U.S. Apr. 30, 2007) (*quoting In re Kahn*, 78 USPQ2d 1329, 1336 (Fed. Cir. 2006))

[2]"A prior art reference must be considered in its entirety, i.e., as a whole, including portions that would lead away from the claimed invention." MPEP §2141.02.VI, page 2100-126 (Rev. 6, Sept. 2007) (*citing W.L. Gore & Assoc. v. Garlock, Inc.*, 220 USPQ 303 (Fed. Cir.

unreasonable interpretation of the claims[3] that disregards explicitly claimed features.[4] As such, the rejection improperly relies upon *ex post* reasoning by "[reading] into the prior art the teachings of the invention in issue".[5] As demonstrated below, the rejection fails to meet the burden of demonstrating that "there was an apparent reason to combine the known elements *in the fashion claimed.*" *KSR Int'l v. Teleflex, Inc.* Slip. op. at 14, 82 USPQ2d at 1396. Rather, the hypothetical combination teaches no more than "the predictable use of prior art elements according to their established functions," *Id.,* with no disclosure or suggestion of the claimed features as a whole.

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1983), *cert. denied*, 469 U.S. 851 (1984))(emphasis in original).

[3]"During patent examination, the pending claims must be 'given their broadest reasonable interpretation consistent with the specification.'" MPEP §2111 at 2100-46 (Rev. 3, Aug. 2005) (*quoting In re Hyatt*, 211 F.3d 1367, 1372, 54 USPQ2d 1664, 1667 (Fed. Cir. 2000)).

"The broadest reasonable interpretation of the claims must also be consistent with the interpretation that those skilled in the art would reach." MPEP §2111.01 at 2100-47 (Rev. 3, Aug. 2005) (*citing In re Cortright*, 165 F.3d 1353, 1359, 49 USPQ2d 1464, 1468 (Fed. Cir. 1999)).

[4]It is well settled that each and every claim limitation must be considered. As specified in MPEP §2143.03, entitled "**All Claim Limitations Must Be Taught or Suggested**": "To establish prima facie obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). 'All words in a claim must be considered in judging the patentability of that claim against the prior art.' *In re Wilson*, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970)." MPEP §2143.03 at 2100-131 (Rev. 5, Aug. 2006).

[5] *KSR Int'l v. Teleflex, Inc.* No. 04-1350, Slip. Op. at 17, 82 USPQ2d at 1397 (*quoting Graham v. John Deere Co.,* 383 U.S. 1, 148 USPQ 459, 474 (1966)).

I.A. The Claim Language

Each of the independent claims 1, 11, 21, (and effectively 31)[6] specifies a routing table (e.g., 20 of Fig. 3) including linkset entries (e.g., 22 of Fig. 3) that include destination point code entries (e.g., 30 of Fig. 3) and respective assigned linkset identifiers (e.g., 32 of Fig. 3), where the linkset identifiers identify prescribed linksets (e.g., 14 of Fig. 1); each of the independent claims also specify that the routing table includes message class entries (e.g., 24 of Fig. 3) identifying respective message classes (e.g., 34 of Fig. 3), where each message class entry specifies at least one destination link identifier (e.g., 36 of Fig. 3) for a corresponding destination link (e.g., 16 of Fig. 1) assigned to the corresponding message class, where the destination links are grouped within the prescribed link sets (e.g., links L0, L1, L2 and L3 in linkset L0 of Fig. 1, etc.).

Further, each of the independent claims specifies that one of the message class entries is selected based on "determining a match between a destination point code value in the received signaling message and the destination point code entry of one of the linkset entries" (e.g., 46 of Fig. 4), and "matching the received signaling message ***to the one message class entry specifying the at least one destination link within the one linkset identified by the one linkset entry***" (e.g., 48 of Fig. 4).

Each of the independent claims further specifies that the received signaling message is matched to the message class entry (associated with the linkset entry having the matching destination point code entry) based on "determining the corresponding identified message class [of the one message class entry] matches the specific message class of the received signaling message," based on the signaling network node "classifying the received signaling message as assigned to a specific message class based on prescribed message class selection criteria" (e.g., 44 of Fig. 4).

Hence, each of the independent claims specifies: (1) classifying the received signaling

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[6]Claim 31 specifies "means for storing", which reads on the routing table 20 illustrated in Figure 3 of the subject application.

message as assigned to a specific message class based on prescribed message class selection criteria (e.g., 44 of Fig. 4); (2) determining a match between a destination point code value in the received signaling message and the destination point code entry of one of the linkset entries (e.g., 46 of Fig. 4); and (3) determining the corresponding identified message class of the one message class entry within the one linkset identified by the one linkset entry matches the specific message class of the received signaling message (e.g., 48 of Fig. 4).

Hence, each of the independent claims require not only matching a destination point code value within one of the linkset entries, but also matching the message class within one of the message class entries associated with the one linkset identified in the one linkset entry having the matching destination point code value. The claimed feature of matching a destination point code value, ***in combination with*** matching a message class for a corresponding ***destination link*** assigned to the corresponding message class and grouped within the prescribed linkset associated with the matching destination point code, is neither disclosed nor suggested in the applied prior art.

I.B. The Broadest Reasonable Interpretation

It is well settled that the broadest reasonable interpretation of the claim language must be consistent with the specification and consistent with the interpretation those skilled in the art would reach.[7]

I.B.1. "Classifying the received signaling message as assigned to a specific message class"

Each of the independent claims 1, 11, 21, and 31 specify that the signaling network node ***classifies*** the received signaling message ***as assigned to a specific message class*** based on ***prescribed message class criteria***: as described in the specification for example on page 6, lines 25-9, page 7, line 4 to page 8, line 25 (with respect to Fig. 2) and page 9, line 28 to page 10, line

[7]See footnote 3 *supra*.

8 with respect to Fig. 4, the processor executes the classification according to the ***prescribed message class criteria*** to ***assign*** the received signaling message ***to a specific message class***.

In particular, the "prescribed message class criteria" are illustrated in Figs. 1 and 2 as "classification methods" executed by the processor 26 and that are *distinct and independent* from the routing information stored in the routing table 20 (see, e.g., page 7, line 4 to page 8, line 19, page 9, line 28 to page 10, line 1, and page 10, lines 7-8). Further, as demonstrated by the Exhibit A submitted with the March 14, 2007 Amendment, the term "classify" generally refers to *arranging, assigning, ordering,* or *organizing* by ***class*** or kind, consistent with the claimed "classifying the received signaling message *as assigned to a specific message class* based on prescribed message class selection criteria"

Hence, the broadest reasonable interpretation of the claimed "classifying" does not rely on the routing information in the routing table, but rather executes the "classifying" based on ***prescribed message class criteria*** (illustrated, for example, in Fig. 2 and step 40 of Fig. 4). (Claims 41-44 explicitly specify that the classifying is independent of any information in the routing table).

In addition to "classifying the received signaling message as assigned to a specific message class", the claims further specify that one of the message class entries stored in the routing table is selected based on the corresponding *identified message class* (identified by the *message class entry*) matching the *specific message class* ***assigned*** to the received signaling message. In other words, "classifying" the received signaling message results in the received signaling message being ***assigned*** to "a specific message class", such that the one message class entry can be selected based on identifying the one message class entry having a corresponding *identified message class* that *matches* the *specific message class* ***assigned*** to the received signaling message (see, e.g., page 8, lines 22-25, page 10, lines 7-13 of the specification).

Therefore, the broadest reasonable interpretation of the claimed "classifying" requires not only that a given attribute of the received signaling message be "determined", but that the received signaling message be ***assigned*** to a ***specific message class*** in order to identify a message class entry having a matching identified message class.

Further, the explicit claim language requires the claimed "specific message class" to be ***assigned*** to the received signaling message ***based on prescribed message class selection criteria*** in order to determine the ***identified*** message class ***among the message class entries*** for the matching destination point code that matches the "specific message class".

I.B.2. "Point Code"

The claimed "destination point code value" is a term of art that is not only explicitly described in the specification, but notoriously well known in the art. The specification describes "point code" at page 1, line 21 to page 2, line 19 as a value that is assigned to a signaling network node of a signaling network for purposes of addressing signaling messages throughout the signaling network (e.g., page 1, line 22 to page 2, line 2).

Hence, a conventional routing table can store for each point code a corresponding specified linkset (e.g., page 2, lines 25-26) for routing a received signaling message. Example routing tables that specify no more than a destination point code value and a corresponding linkset are illustrated in Fig. 5 of Prasad et al. (see para. 30: a particular point code value 800 is referenced within a routing context of either "upward" or "downward"), Fig. 6(a) of Miller et al. ("each entry in MTP routing table 600 includes a point code field and an internal linkset address field 604. Point code field 602 stores point codes to be compared to destination point codes extracted from SS7 messages." (Col. 9, lines 12-15; see also col. 9, lines 15-20 regarding definition of linkset address field, col. 9, lines 21-48, and col. 9, line 49 to col. 10, line 3 regarding Fig. 6B describing routing using the table of Fig. 6A)). Paragraphs 5-6 of U.S. Patent Publication No. 2002/0186702 by Ramos et al. also describe the destination point code (DPC), where "[t]ypically, the DPC is associated with more than one signaling link that may be used to carry the message", where the signaling link selection field (SLS) is used to select the signaling link within the link set.

Hence, the broadest reasonable interpretation of "destination point code" requires the term to be strictly limited to its usage as in the specification and in the art, namely a specific

address value that is assigned to a specific node in the SS7 network and specified in a routing table to identify a destination linkset for routing a received signaling message specifying the destination point code to the specific node.

I.B.3 "Destination Link Identifier for a Corresponding Destination Link"

The claims explicitly specify a "destination link identifier for ***a corresponding destination link***". As illustrated in the specification, the destination link identifier (e.g., "L0") 36 identifies a corresponding destination link (e.g., "L0" 16 of Fig. 1) that is assigned within a given linkset (e.g., "LS0") 14 of Fig. 1. A data link is used to connect one signaling network node to another signaling network node, where multiple data links (e.g., 16 of Fig. 1) may be grouped into a single linkset (e.g., 14 of Fig. 1), and where the linkset is connected to another corresponding signaling node within the SS7 network (see, e.g., page 1, lines 11-12; page 6, lines 10-19; page 9, lines 3-15; see also Fig. 2 of Prasad et al., illustrating links 30, 40, and 50 connecting signaling nodes 10 and 20; Fig. 2 of Jeong illustrating "n links are connected between exchanges A and B" (col. 3, lines 36-37); Figs. 3-4 of Miller illustrating fixed bandwidth signaling links 308, 310, and 312 connecting the edge device 306 to SSPs 300, 302, and 304, respectively).

Hence, the broadest reasonable interpretation of "link identifier" (e.g., destination link identifier) requires the identifier refer to an SS7 signaling link that directly connects the signaling network node to another signaling network node.

I.C. No Prima Facie Case of Obviousness

As demonstrated below, the rejection fails to demonstrate that the hypothetical combination of Prasad et al., Jeong, and Miller et al. teach or suggest the claimed subject matter, *as arranged in the claim.*

I.C.1. Prasad et al.

Prasad et al. does not disclose a routing table configured for storing message class entries

***identifying*** respective message classes, each message class entry specifying ***at least one destination link identifier*** for a corresponding destination link assigned to the corresponding message class, as claimed. Figure 5 of Prasad et al. illustrates no more than a routing table 800 that specifies a point code field 810 and a corresponding routing context 820: **no further information is specified in the routing table 800.**

Hence, the rejection is per se deficient because Prasad et al. fails to store a message class entry that ***identifies*** a message class, ***and that specifies at least one destination link identifier***, as claimed.

"Routing Context" vs. "Message Class"

Further, the assertion on page 3 that "the 'routing context' could be equivalent to a 'message class' because both are used for the organization of the signaling messages into categories for treatment" is inconsistent with the specification and the interpretation that those skilled in the art would reach, because the assertion ignores: (1) the explicit claim language specifying that the determined match between the destination point code value in the received signaling message and the destination point code entry identifies a corresponding one of the linkset entries, enabling the identified one linkset entry to be used to "organize" the signaling message "into categories for treatment"; (2) Prasad et al. uses the destination point code in the received signaling message to identify the matching point code 810 in the routing table 800 in order to determine whether the signaling message should be routed over an existing SS7 network (routing context equals 0) or an IP network 110 (routing context equals 1) (e.g., para. 30-33); and (3) Miller et al. utilizes *precisely* the same type of routing table 600 in Figs. 6(a) and 6(b) to determine whether a signaling message having a given point code 602 should be output to a linkset address 604 specifying a link interface module (LIM) for a fixed bandwidth SS7 link, or a linkset address 604 specifying a database communication module (DCM) 404 for a variable bandwidth Internet Protocol (IP) data link 316.

Hence, the specification, Prasad et al., and Miller et al. illustrate that the **destination point code** is used to "organize" signaling message into "categories for treatment", whereas the

claims explicitly specify the "specific message class" of the received signaling message and the "identified message class" of the message class entry are used to identify the destination link within the one linkset identified based on the matching destination point code entry. Consequently, the interpreting of the claimed "message class" as reading on the disclosed "routing context", is inconsistent with the specification, inconsistent with the interpretation those skilled in the art would reach, and therefore unreasonable.

"Point code" vs. "Link Identifier"

As described above in Section I.B.2, the term "point code" is explicitly described in the specification and the applied prior art as a specific term of art that represents a specific address value that is assigned to a signaling network node in order to enable routing of signaling messages within a signaling network, based on identifying a match between a destination point code value in a received signaling message the specified point code value in the routing table to identify a destination linkset.

Further, as described above in Section I.B.3, the term "link identifier" is explicitly described in the specification and the applied prior art as a specific term of art identifying a specific signaling link that is used to connect the signaling network node to another signaling network node.

Hence, the broadest reasonable interpretation of "point code" and "link identifier" require that these two terms must be independent and distinct, because each and every signaling network node as described in the specification and the applied prior art explicitly requires the fundamental concept of network routing, namely utilizing the destination point code in a received signaling message in order to determine the linkset (containing multiple links having respective link identifiers), in order to output the received signaling message to an adjacent signaling network node via the signaling link having the link identifier: any attempt to equate a "point code" to a "link identifier" would destroy this fundamental routing concept of network routing.

Hence, the assertion on page 3 of the rejection that "the 'point code' could be equivalent to 'link identifier' because both are used to specify destination for signaling messages" is not

only unreasonable because it is inconsistent with the specification and the interpretation one skilled in the art would reach, but also borders on being fundamentally nonsensical because it disregards the fundamental concept of how messages are routed through a network, namely selecting a linkset for forwarding a signaling message to the node assigned the destination point code.

For this reason alone the §103 rejection must be withdrawn because the rejection fails to demonstrate that Prasad et al. discloses or suggests the claimed features as asserted in the rejection: Prasad et al. discloses a routing table that stores point code values and respective linkset identifiers in the form of "routing contexts", with no disclosure or suggestion of the claimed message class, let alone determining whether the corresponding ***identified*** message class matches the ***specific*** message class of the received signaling message. Any distortions of Prasad et al. by the rejection is insufficient to overcome the deficiencies of the reference, because the teachings of the reference must be considered in its entirety.[8]

I.C.2. Jeong

As admitted in the rejection, "Prasad fails to explicitly suggest selecting one of the destination links based on the processor classifying the received signaling message as assigned to the corresponding message class based on prescribed message class selection criteria."

Jeong teaches selecting a link based on a signaling link selection (SLS) value: Jeong relies on the explicit value of the Signaling Link Selection (SLS) field to explicitly specify the link that should be used: this very teaching is already described in the Applicant's admitted prior art at page 2, line 27 to page 3, line 3. The use of an explicit Signaling Link Selection is therefore a mapping, and not a classification based on ***prescribed message class selection criteria***, as claimed.

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[8]"A prior art reference must be considered in its entirety, i.e., as a whole, including portions that would lead away from the claimed invention. MPEP §2141.02, page 2100-126 (Rev. 6, Sept. 2007) (*citing W.L. Gore & Assoc. v. Garlock, Inc.*, 721 F.2d 1540, 220 USPQ 303 (Fed. Cir. 1983), *cert. denied*, 469 U.S. 851 (1984))(emphasis in original).

Jeong does not disclose or suggest the claimed "classifying the received signaling message ***as assigned to the corresponding message class***, based on prescribed ***message class selection criteria***." As described in section I.B.1 *supra*, the claimed classifying results in actively ***assigning*** the received signaling message to a ***message class*** based on prescribed ***message class selection criteria***: such classification cannot be as trivial as mapping the SLS field, as asserted by the Examiner.

In fact, Jeong teaches away from the claimed classifying by explicitly specifying that if the destination link chosen in step 317 (e.g., "ath" link based on mapping the SLS field in step 315 to a specific remainder value "a") of Figure 3 is not available in step 319, a new link number is chosen in step 321 in order to direct the received signaling message to another destination link (e.g., "cth" link) in step 323 (see, e.g., column 4, lines 11-31).

Hence, Jeong teaches that the selection of a destination link is **changed** (from the "ath" link to the "cth" link), not based on any attribute of the received signaling message, but based on the availability of the chosen destination link. Hence, the mapping by Jeong of the SLS value teaches away from the claimed classifying the received signaling message as ***assigned*** to a specific ***message*** class, because the mapping by Jeong is **completely arbitrary** based on whether the destination signaling link is available.

For this reason alone the §103 rejection must be withdrawn.

Further, Jeong assumes that a specific destination has already been determined ( i.e., Exchange B), and that only the specific signal link that connects the two exchanges needs to be identified. For example, Jeong explicitly identifies the exchange as an exchange for "a specific destination" (see col. 3, lines 50-54 and 58-61; column 4, lines 30-35; claims 14 and 15 in column 6). Hence, Jeong provides no disclosure or suggestion of classifying the received signaling message to a specific message class in order to select one message class entry having a corresponding identified message class that ***matches*** the specific message class, as claimed.

For these and other reasons, the §103 rejection must be withdrawn.

I.C.3 Miller et al.

As described *supra* on pages 16-18, Miller discloses an edge device 306 in a network, illustrated in Fig. 3. The edge device 306 is illustrated in Figure 4 as having link interface modules (LIM) 400 and 402 for sending signaling messages to SSPs in the SS7 network, and a DCM 404 for sending messages via an IP network 316. Figure 6(a) illustrates a conventional routing table that includes a point code field 602 to be compared to destination point codes extracted from SS7 messages, and an internal linkset address field 604 (see, e.g., col. 9, lines 12-48), where the linkset address field 604 specifies a linkset for a given interface module 400, 402, or 404. The routing of signaling messages is described with respect to Fig. 6B, where if the message is addressed to a local node, the message is forwarded to an LIM for transmission via the SS7 network using one of the fixed-bandwidth signaling links (col. 9, line 49 to col. 10, line 3).

The assertion on page 5 of the Official Action that a "fixed-bandwidth" signaling link could be equivalent to a "message class" is unreasonable, because Miller et al. describes that **all** SS7 signaling links are fixed bandwidth signaling links (see col. 2, lines 20-28), whereas the IP link is deemed a variable bandwidth signaling link (e.g., col. 5, lines 56-59). Further, as demonstrated above on pages 16-18, Miller et al. utilizes precisely the same type of routing table 600 as Prasad in order to map a destination point code to a **linkset address** specifying either a link interface module (LIM) for a fixed bandwidth SS7 link, or a DCM module 404 for a variable bandwidth IP data link 316. Both Miller et al. and the subject application consistently use the terms "destination point code" and "linkset" in the same manner: the argument that "it could be a category for the specific treatment of a signaling message" is vague, ambiguous, unfounded, and inconsistent with the specification and applied prior art that specifically and precisely teaches that the **destination point code** is used as the "category for the specific treatment of a signaling message", where the "specific treatment" is outputting the signaling message to the linkset address 604 specified in the routing table.

Hence, Miller et al. fails to disclose or suggest determining a match between a destination point code value in the received signaling message and the destination point code entry of one of

the linkset entries, ***in combination with matching*** the received signaling message to the ***one message class entry*** specifying the at least one destination link within the one linkset identified by the one linkset entry. Miller et al. discloses a routing table specifying a point code value and a corresponding linkset identifier, but fails to disclose or suggest the claimed message class entry that is ***distinct*** from the claimed linkset entry.

For this reason alone the §103 rejection must be withdrawn because the applied reference fails to disclose the claimed features as asserted in the rejection.

I.D. The Hypothetical Combination

As apparent from the foregoing, Prasad et al. and Miller et al. each disclose the same type of routing table that identifies a destination linkset identifier based on the corresponding point code in the corresponding routing table entry matching the destination point code of the received signaling message, where the destination linkset identifier may include multiple signaling links (e.g., see links 50 in Figs. 3-4 of Prasad; links 308, 310 in Fig. 4 of Miller et al.). Jeong teaches no more than selecting an individual link based on the signaling link selection field, and based on whether the selected destination link is available.

Hence, the hypothetical combination discloses no more than a routing table that enables a destination linkset identifier to identify either a conventional SS7 signaling linkset (having multiple signaling links), or an IP-based linkset, where an individual link can be selected based on the signaling link selection field of the received signaling message.

Hence, while the hypothetical combination discloses the claimed determining of a match between a destination point code in the received signaling message and the destination point code entry of one of the linkset entries, the hypothetical combination fails to disclose or suggest the ***additional*** features of "classifying the received signaling message as assigned to a specific message class based on prescribed message class selection criteria," "selecting one of the message class entries based on determining the corresponding identified message class matches the specific message class of the received signaling message," or "matching the received signaling message to the one message class entry specifying the at least one destination link

within the one linkset identified by the one linkset entry," as claimed.

Hence, the §103 rejection must be withdrawn because the rejection fails to demonstrate that the "there was an apparent reason to combine the known elements *in the fashion claimed.*" *KSR Int'l v. Teleflex, Inc.* Slip. op. at 14, 82 USPQ2d at 1396.

II. Dependent Claims 41-43

Each of the dependent claims 41, 42, 43, ***and*** 44 depend directly from the respective independent claims 1, 11, 21, and 31 and specify "classifying the received signaling message independent of any information in the routing table."

The rejection of dependent claims 41, 42, and 43 on pages 6-7, 11, and 14 of the Official action is respectfully traversed because it is inconsistent with the rejection of claim 44 on page 25 of the Office Action, which admits that "Prasad, Jeong, Miller, and/or their combination fail to explicitly suggest wherein the classifying includes classifying the received signaling message independent of any information in t he routing table." For this reason alone the rejection of depending claims 41, 42, and 43 must be withdrawn because the arguments on pages 6-7, 11, and 14 are inconsistent with the admission on page 25 at the hypothetical combination of Prasad, Jeong, and Miller fails to disclose or suggest the claimed features.

The rejection of dependent claims 41, 42, and 43 is further traversed because Jeong is limited to choosing a signaling link **between exchanges**, *after* selection of the linkset entry as illustrated by the routing tables in the hypothetical combination (e.g., Fig. 6(a) of Miller et al.). Hence, the hypothetical combination still relies on the routing tables in order to first identify the linkset entry serving the destination exchange, followed by choosing the signaling link within the identified link set entry serving the destination exchange. Moreover, as described above the selection of a signaling link in Jeong is arbitrary based on the availability of the destination link, and is not a teaching of the claimed classifying according to prescribed message selection class criteria.

For these and other reasons, the rejection of claims 41-43 should be withdrawn.

III. Claims 8, 18, 38, and 44-47.

The rejection of claims 8, 18, 38, and 44-47 in view of Prasad, Jeong, Miller, and U.S. Patent Publication No. 2004/0081206 by Allison et al. is respectfully traversed, **as Allison et al. is not prior art.**

Applicant objects to the rejection as incomplete because it fails to answer all material traversed. In particular, both the December 26, 2007 Final Office Action and the Office Action mailed March 21, 2008 fail to address Applicant's arguments of September 6, 2007 demonstrating that Allison is Not Prior Art. Specifically, Allison et al. was filed on July 31, 2003, **after** the December 20, 2001 filing date of the subject application. Further, Allison et al. is a CIP of U.S. Patent No. 6,662,017 and U.S. Patent No. 7,035,239 (considered by the Examiner on February 29, 2008 and therefore of record in the subject application). The description in paragraph 34 (relied upon in the rejection) of the applied reference is not supported by the parent applications that resulted in U.S. Patent No. 6,662,017 and U.S. Patent No. 7,035,239 (for example, neither parent application disclosed the discriminator 318 of Figure 3).

For these and other reasons, this rejection should be withdrawn because Allison et al. is not available as a reference.

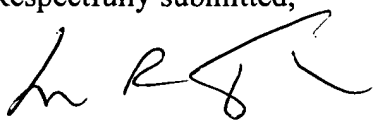
IV. Conclusion

It is believed the remaining dependent claims are allowable in view of the foregoing.

In view of the above, it is believed this application is in condition for allowance, and such a Notice is respectfully solicited.

To the extent necessary, Applicant petitions for an extension of time under 37 C.F.R. 1.136. Please charge any shortage in fees due in connection with the filing of this paper, including any missing or insufficient fees under 37 C.F.R. 1.17(a), to Deposit Account No. 50-1130, under Order No. 95-474, and please credit any excess fees to such deposit account.

Respectfully submitted,



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